

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

Dearborn Life Insurance Company d/b/a Blue
Cross Blue Shield of Texas,

Plaintiff

vs.

**MOTION FOR CHANGE OF
VENUE BY CONSENT OF THE
PARTIES**

Balkees Abderrahman, Alexandra K.L. Noel,
and Helen M.Y. Turner,

Defendants

NOW COME the undersigned parties, by and through their respective counsel, and jointly move this Court to transfer this action to United States District Court for the Southern District of Texas, Houston Division, pursuant to 28 U.S.C. § 1404(a).

1. 28 U.S.C. § 1404(a) states, "For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought or to any district or division to which all parties have consented."

2. This interpleader action was commenced by Plaintiff Dearborn Life Insurance Company d/b/a/ Blue Cross Blue Shield of Texas ("Dearborn") on September 12, 2024 in United States District Court for the Western District of Texas, Austin Division. As described below, Dearborn is no longer an interested party.

3. The interested parties agree that the United States District Court for the Southern District of Texas, Houston Division is a more appropriate venue for this litigation for the following reasons:

- Dearborn commenced this action in United States District Court for the Western District of Texas, in part, because it is based in that district.
- Dearborn deposited the funds at issue into the Court's registry and is no longer an interested party in the litigation. *See* Exhibit 1.
- The majority of relevant events occurred in Houston, Texas.
- Defendant Balkees Abderrahman, MD, PhD resides in Houston, Texas.
- Defendant Helen M.Y. Turner resides in Salt Lake City, Utah.
- Defendant Alexandra K.L. Noel resides in Stillwater, Minnesota.
- The majority of witnesses and relevant documents are located in Houston, Texas.
- The remaining three individual parties have counsel in Houston, Texas.
- The transfer will promote judicial economy and avoid unnecessary burdens on the remaining parties and the Court.

4. Defendants have fully discussed the issues and have reached a mutual agreement to transfer this case to the Southern District, Houston Division.

WHEREFORE, for the foregoing reasons, the Defendants respectfully request that this Court grant their Agreed Motion to Transfer Venue and transfer this action to the United States District Court for the Southern District of Texas, Houston Division; and

The parties further request that the sum of money deposited into this Court's registry by Plaintiff be transferred to the registry of the United States District Court for the Southern District of Texas, Houston Division.

Date: April 21, 2025

Respectfully submitted,

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Date: April 21, 2025

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